

# Ethics and Compliance

Cargill's customers, employees, and communities count on us to uphold the highest ethical business practices. We embed ethics and compliance into our business and culture, which drives our business conduct and strengthens our reputation as a partner of choice. From our Code of Conduct to our Corporate Human Rights and Environmental Due Diligence Policy, we seek to foster trust and transparency.



# Our approach

Our shared ethical standards guide us when we face ethical dilemmas, and our strong focus on compliance drives our business conduct throughout the world.

In business, strong ethics isn't just checking a box, it's the foundation of long-term success. Making ethical decisions means winning the right way and considering the bigger picture — how our actions impact employees, customers, investors, and the communities we serve. Since we were founded in 1865, we've acted on the belief that our word is our bond and doing the right thing is key to our progress."

## Rishi Varma

Chief Legal and Compliance Officer and Corporate Secretary, Chair of Asia Pacific Cargill



# Our expectations

Our ethical approach is grounded in our **Code of Conduct**, which includes our **Guiding Principles** and references our compliance policies. The Code applies to all employees worldwide, as well as anyone acting on behalf of Cargill. Reviewed annually, Cargill has had a written Code of Conduct since 2012. Our suppliers are expected to uphold the same principles, as outlined in the **Supplier Code of Conduct**. If someone has a concern about the conduct of a Cargill employee or a person representing Cargill, we want them to speak up. Our **Ethics Open Line** is available 24 hours a day, seven days a week worldwide, for confidential reports.

[Learn more about ethics and compliance at Cargill.](#)

# Our ongoing commitment

Ethics and compliance are embedded in our business. Throughout the year, we promote compliance messages and share case studies with employees. We also provide training on topics such as anti-bribery, anti-fraud, data privacy, conflicts of interest, and ethical behavior. As part of the onboarding process, new employees receive mandatory compliance training in their first three months. Current employees must complete an annual refresher training on our ethical standards and compliance expectations.

We expect employees to make ethical decisions every day. During our annual Ethics Week in 2025, we highlighted the theme of building trust. As part of this global campaign, teams around the world delved into how building trust helps each other, our customers, and the planet. At our production facilities and corporate locations, we engaged employees in discussions about ethical dilemmas

on topics including avoiding conflicts of interest and corruption. We also invited employees to share their commitment to doing the right thing, and thousands of employees posted their statements internally and on social media.

## Ethics Week 2025

We engaged over 64,000 of our office employees through internal social media and intranet stories. In addition, employees (including our production staff) from more than 50 countries viewed our external webpage and shared numerous photos and videos showing their participation in the annual event.



# Responsible sourcing

Sourcing responsibly is core to how we do business — helping us nourish the world in a safe, responsible, and sustainable way, while driving positive impact across our supply chains. It's also essential to meeting customer expectations and emerging regulations. We integrate due diligence into our policies and risk management practices in our operations and supply chains by building transparent, risk-based processes that promote human rights, safeguard the environment, and strengthen long-term supply chain resilience.

We continue to evolve our approach to responsible sourcing by updating policies, processes, and frameworks to align with customer needs and regulatory requirements:



- Our **Supplier Code of Conduct** has been in place since 2018 and was updated in 2023. The code details our mandatory human rights and environmental expectations for all suppliers, including Cargill's right to conduct due diligence to ensure compliance. It is incorporated into supplier contracts, vendor agreements, and referenced in supplier questionnaires, and we request that all suppliers acknowledge it.
- Our **Human Rights and Environmental Due Diligence Policy**, formalized in 2023, outlines Cargill's process for identifying and addressing human rights and environmental risks within our own operations, supply chains, and business relationships. It allows our businesses to adopt risk-based approaches designed to protect people across operations and the supply chain, adapted to their local context.
- Our **Human Rights Policy** outlines the company's commitment to respecting internationally recognized human rights across our operations and supply chains. It emphasizes the importance of treating people with dignity, championing action, and protecting both people and the planet. We expect our suppliers and business partners to uphold these principles and adopt similar policies.
- Our **Human Rights and Environmental Grievance Process** provides a framework for internal and external stakeholders to raise concerns about human rights or environmental issues relating to Cargill or our suppliers. This process aims to ensure that complaints are received, addressed, and monitored across Cargill's supply chains and our own operations. In response, grievance panels review high-risk concerns and ensure time-bound actions are in place.

## Protecting animal welfare

At Cargill, we prioritize the welfare of animals<sup>1</sup> throughout our operations by embracing proven animal science, responsible husbandry practices, and recognized industry standards. We do not tolerate abusive behavior directed at animals and collaborate with farmers and ranchers, customers, non-governmental organizations (NGOs), academics, scientists, and veterinarians to promote best practices in animal welfare.

Our approach to animal welfare includes strategic research partnerships, such as collaborating with Dr. Lily Edwards from Colorado State University on a project to analyze ideal shade and flooring for beef cattle and end-of-life decisions for dairy cattle.

To foster greater awareness and understanding, we bring leading voices in animal welfare to our teams. This past year, we hosted animal welfare advocate Dr. Temple Grandin at our U.S. offices,

creating valuable opportunities for dialogue with our employees and leaders.

We actively engage with a variety of organizations, such as the **International Poultry Welfare Alliance**, where we chair committees and helped develop the Key Welfare Indicator Guides and related online training modules in collaboration with the Center for the Optimization of Poultry at Fresno State.

We support animal welfare practices that improve the health and well-being of farm animals. Cargill also helps reduce the risk of animal illness and associated economic disruption while supporting the long-term health of global food systems.

Learn more about Cargill's **animal welfare programs** and **animal welfare index**.

<sup>1</sup> Animal: farmed animals, excluding insects.

